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15 *and Kelly Chang Rickert*

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17 **Admitted pro hac vice

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christopher Kohls,
Plaintiff,
v.
Rob Bonta, et al.,
Defendants.

Case No. 2:24-cv-02527-JAM-CKD

Stipulation to Consolidate

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Case No. 2:24-cv-02787-JAM-CKD

v.
Rob Bonta, et al.,
Plaintiffs,
Defendant

Rumble Inc., et al.

Case No. 2:24-cv-03315-JAM-CKD

v.
Rob Bonta, et al.

STIPULATION

1. This Court recognized that the above-entitled actions are related within the meaning of Local Rule 123. Related Case Order, ECF No. 28. It previously ordered the *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD, and *The Babylon Bee, LLC v. Bonta*, No. 2:24-cv-02787-JAM-CKD, matters consolidated. Order Consolidating Cases, ECF No. 20.

1 2. Plaintiffs in all three of the above-entitled actions challenge the same
2 California statute: AB 2655 (Cal. Elec. Code § 20510). Plaintiffs Christopher Kohls,
3 The Babylon Bee, LLC, and Kelly Chang Rickert also challenge AB 2839 (Cal. Elec.
4 Code § 20012).

5 3. Plaintiffs in all three of the above-entitled actions bring the same or
6 similar constitutional claims against the same Defendants: California Attorney
7 General Rob Bonta and Secretary of State Shirley N. Weber. Plaintiffs in *Rumble*
8 also bring Section 230 claims against AB 2655 and against the same Defendants.

9 4. All parties in the above-entitled matters consent to consolidation of
10 these actions.

11 NOW THEREFORE, the parties hereby STIPULATE that:

12 5. The above-entitled actions shall be consolidated for all purposes.

1 DATED: December 19, 2024
2

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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christopher Kohls,

Case No. 2:24-cv-02527-JAM-CKD

V.

Plaintiff,

ORDER to Consolidate

Rob Bonta, et al.,

Defendants.

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Case No. 2:24-cv-02787-JAM-CKD

V.

Plaintiffs,

Rob Bonta, et al..

Defendants.

Case No. 2:24-cv-03315-JAM-CKD

Rumble Inc., et al.

Plaintiffs.

Rob Bonta, et al.

Defendants.

1 Before the Court is Plaintiffs Christopher Kohls, The Babylon Bee, LLC,
2 Kelly Chang Rickert, Rumble Inc., Rumble Canada Inc., and Defendants Rob Bonta
3 and Shirley N. Weber's joint stipulation to consolidate *Kohls v. Bonta*, No. 2:24-cv-
4 02527-JAM-CKD, with *Rumble, Inc. v. Bonta*, No. 2:24-cv-03315-JAM-CKD. Good
5 cause appearing, the Court makes the following orders:

6 1. Pursuant to Fed. R. Civ. P. 42, the actions denominated as *Kohls v.*
7 *Bonta*, Case No. 2:24-cv-02527-JAM-CKD and *Rumble, Inc. v. Bonta*, Case No. 2:24-
8 cv-03315-JAM-CKD are hereby **CONSOLIDATED** for all purposes;

9 2. Case No. 2:24-cv-02527-JAM-CKD is designated as the "master file;"

10 3. The Clerk of the Court is **DIRECTED** to add all complaints and
11 answers filed in Case No. 2:24-cv-03315-JAM-CKD to the master file;

12 4. The Clerk of the Court is **DIRECTED** to **ADMINISTRATIVELY CLOSE** Case No. 2:24-cv-03315-JAM-CKD; and

13 5. The parties are **DIRECTED** to file all future pleadings, motions, and
14 other filings ONLY in Case No. 2:24-cv-02527-JAM-CKD.

15 It is so ORDERED.

16 Dated: December 19, 2024

17 /s/ John A. Mendez

18 THE HONORABLE JOHN A. MENDEZ
19 SENIOR UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 19th day of December, 2024.

s/ Johannes Widmalm-Delphonse
Johannes Widmalm-Delphonse
Counsel for Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert